## **POLSINELLI**

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Counsel for ResCap Borrower Claims Trust

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:	) Case No. 12-12020 (MG)
RESIDENTIAL CAPITAL, LLC, et al.,	Chapter 11
Debtors.	Jointly Administered

## CERTIFICATE OF NO OBJECTION TO SECOND MOTION FOR ORDER EXTENDING THE TERM OF THE RESCAP BORROWER CLAIMS TRUST

The ResCap Borrower Claims Trust ("Borrower Trust")<sup>1</sup>, as successor to the debtors and debtors-in-possession in the above-captioned cases, hereby submits this *Certificate of No Objection to Second Motion for Order Extending the Term of the ResCap Borrower Claims Trust* (the "Certificate"), pursuant to Local Bankruptcy Rule 9075-2, and respectfully states:

- 1. On November 16, 2018, the Second Motion for Order Extending the Term of the ResCap Borrower Claims Trust was filed as Document Number 10595 (the "Motion").
- 2. Pursuant to the Order dated May 23, 2012, establishing notice, case management and administrative procedures (Docket No. 141), notice of the Motion was provided by First-Class United States mail or electronic mail on November 16, 2018 and November 18, 2018, to

<sup>&</sup>lt;sup>1</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

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the parties and claimants listed on Exhibits A and B to the Affidavit of Service filed on November

27, 2018 as Document Number 10597.

3. The deadline for filing and objection or response to the Motion expired on

November 30, 2018 (the "Objection Deadline").

4. The Objection Deadline has now passed and counsel has reviewed the case docket

not less than forty-eight (48) hours after expiration of the Objection Deadline, and is not aware

of any objection, responsive pleading, or request for hearing with respect to the Motion that have

been filed with the clerk or served on counsel for the Borrowers Trust.

5. The Borrowers Trust respectfully requests that the Court enter an order granting

the Motion without further pleading or a hearing. A copy of the proposed Order that was

attached to the Motion, modified to reflect that no Objections have been filed and, therefore, that

no Hearing on the Motion is required, is submitted with this Certificate.

Dated: New York, New York

December 6, 2018

/s/ Daniel J. Flanigan

Daniel J. Flanigan

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